



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Patricia Blevins, Treasurer
Democratic State Committee Delaware
P.O. Box 2065
Wilmington, DE 19899

NOV 3 7 2002

Identification Number: C00211763

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Ms. Blevins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses memo Schedule A's totaling \$3271.65 from the ASDC, VF, and the DNC, D4D which appear to be joint fundraising committees. However, you have disclosed names of other joint fundraising committees: "DNC State Party Victory Fund" and "ASDC/Dollars for Democrats," as additional descriptions for these receipts. Furthermore, there are no corresponding transfers-in from any of the committees disclosed on Schedule A supporting Line 12 of the Detailed Summary Page. Please amend your report to clarify which joint fundraising committees the receipts are from and clarify the apparent discrepancies in transfers-in.

-On Schedule H4 your committee has allocated disbursements to your non-federal account for ratio and rebate/refund adjustments. Please be advised that by definition, this activity(s) does not qualify as a shared expense to be allocated between your federal and non-federal accounts. Transfers to the non-federal account for the non-federal portion of offsets to operating expenditures and ratio-adjustments that increase the federal account's percentage for a fundraising event should not be allocated on Schedule H4. These types of disbursements should be disclosed as 100% federal transfers-out to avoid apparent excessive transfers-in from your non-federal

account. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

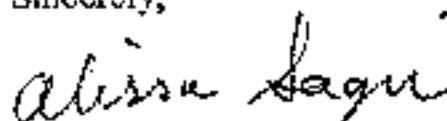
-Schedule H3 of your report discloses a transfer(s)-in from a non-federal account(s) for Jefferson - Jackson Dinner 2002 which appears to exceed the permissible amount(s) indicated by your allocation ratio for this event. Please be advised that transfers for shared activity must not exceed the non-federal share of the joint disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before or 60 days after payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of this transfer(s)-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-On Schedule H2, you disclose the ratio for "Jefferson - Jackson Dinner 2002" to be Revised; however, Schedule H2 of your 2002 Amended April Quarterly Report disclosed a ratio for this activity/event which is identical to the one given in this report. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Alissa V. Sagri
Campaign Finance Analyst
Reports Analysis Division

